

Matthew R. Lewis (7919)  
Taylor J. Smith (17537)  
**KUNZLER BEAN & ADAMSON, PC**  
50 W. Broadway, 10th Floor  
Salt Lake City, Utah 84101  
Telephone: (801) 994-4646  
[mlewis@kba.law](mailto:mlewis@kba.law)  
[tsmith@kba.law](mailto:tsmith@kba.law)

Jason P. Gottlieb (admitted *pro hac vice*)  
David E. Ross (admitted *pro hac vice*)  
Alexander R. Yarm (admitted *pro hac vice*)  
**MORRISON COHEN LLP**  
909 Third Avenue, 27<sup>th</sup> Floor  
New York, New York 10022  
Telephone: (212) 735-8600  
[jgottlieb@morrissoncohen.com](mailto:jgottlieb@morrissoncohen.com)  
[dross@morrissoncohen.com](mailto:dross@morrissoncohen.com)  
[ayarm@morrissoncohen.com](mailto:ayarm@morrissoncohen.com)

*Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

---

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF UTAH**

---

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC. (d/b/a “DEBT  
Box”), a Wyoming Corporation, et al.;

Defendants,

ARCHER DRILLING, LLC, a Wyoming  
limited liability company, et al.;

Relief Defendants.

**DEFENDANTS JASON R. ANDERSON,  
JACOB S. ANDERSON, SCHAD E.  
BRANNON, AND ROYDON B. NELSON  
AND RELIEF DEFENDANTS BUSINESS  
FUNDING SOLUTIONS, LLC, BLOX  
LENDING, LLC, THE GOLD  
COLLECTIVE LLC, AND UIU  
HOLDINGS, LLC’S MOTION FOR  
LEAVE TO FILE OVERLENGTH  
REPLY MEMORANDUM IN FURTHER  
SUPPORT OF THEIR MOTION TO  
DISMISS THE COMPLAINT  
PURSUANT TO FED. R. CIV. P. 12(b)(6)**

---

	<p style="text-align: center;"><b>ORAL ARGUMENT REQUESTED</b></p> <p style="text-align: center;">Case No. 2:23-cv-00482-RJS-DBP</p> <p style="text-align: center;">Chief Judge Robert J. Shelby Magistrate Judge Dustin B. Pead</p>
--	---

---

Pursuant to DUCivR 7-1(a)(6), Defendants Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, and Roydon B. Nelson, (collectively, the “Defendants”), and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective LLC, and UIU Holdings, LLC (collectively, the “Relief Defendants”), by and through undersigned counsel, hereby submit this Motion for Leave to File Overlength Reply Memorandum. For good cause shown herein, this motion should be granted.

**BACKGROUND**

In responding to Defendants and Relief Defendants’ Motion to Dismiss (ECF No. 197), the SEC filed an opposition (ECF No. 206) that surpassed the default limit by 15 pages (*see also* ECF No. 204). Defendants and Relief Defendants now seek to fully respond to the Opposition by filing a reply that surpasses the default page limit by just 3 pages.

**ARGUMENT**

Under DUCivR 7-1(a)(6), the Court may authorize an overlength reply so long as the parties move the Court before filing the proposed reply, state the number of additional pages needed, and state the good cause that justifies the additional length. Defendants and Relief Defendants seek an additional 3 pages (for a reply memorandum totaling thirteen pages) in order to respond to an Opposition a full 15 pages over the default limit. Given the court’s allowance of

that overlength brief, the complex legal issues addressed herein, and the breadth of the necessary reply, this motion satisfies those requirements, and as such the motion should be granted.

**CONCLUSION**

For the foregoing reasons, this motion should be granted.

DATED: December 4, 2023

Respectfully submitted,

**KUNZLER BEAN & ADAMSON, PC**

/s/ Taylor J. Smith

Matthew R. Lewis

Taylor J. Smith

**MORRISON COHEN LLP**

Jason P. Gottlieb (admitted pro hac vice)

David E. Ross (admitted pro hac vice)

Alexander R. Yarm (admitted pro hac vice)

*Attorneys for Defendants Jason R. Anderson, Jacob S. Anderson, Chad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC; Blox Lending, LLC; The Gold Collective LLC; and UIU Holdings, LLC*

**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 4th day of December, 2023, I caused a true and correct copy of the foregoing **DEFENDANTS JASON R. ANDERSON, JACOB S. ANDERSON, SCHAD E. BRANNON, AND ROYDON B. NELSON AND RELIEF DEFENDANTS BUSINESS FUNDING SOLUTIONS, LLC, BLOX LENDING, LLC, THE GOLD COLLECTIVE, LLC, AND UIU HOLDINGS, LLC'S MOTION FOR LEAVE TO FILE OVERLENGTH REPLY MEMORANDUM** to be submitted for electronic filing through the Court's CM/ECF system and accordingly served on all parties.

/s/ Michelle Hansen  
Michelle Hansen